



National Association of State Telecommunications Directors

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President
RAY PENROD (OK)
Chief
Communications Operations
Information Services Division
Office of State Finance
State Capitol Building, Room 4F
Oklahoma City, OK 73105
(405) 521-3084
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William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Re: Requests for Assignment of N11 Codes
IAD File No. 94-101

Vice President
WILLIAM M. MILLER (NE)
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Dear Mr. Caton:

Secretary/Treasurer
ANTHONY HERBERT (MT)
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The National Association of State Telecommunications Directors (NASTD) hereby submits its comments in response to the Commission's Public Notice of June 17, 1994 in the referenced proceeding. The Commission is seeking comments on the best use for N11 service codes and other abbreviated dialing arrangements, particularly in light of requests received subsequent to the submission of comments in CC Docket No. 92-105. Among those requests was one from the NASTD on September 22, 1993 that an N11 code (e.g. 211) be assigned for access to state governments. Another was from the General Services Administration ("GSA") on March 11, 1994 seeking an N11 code for the public to access federal executive agencies.

Immediate Past President
GLENN W. MAYNE (FL)
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NASTD is the national association of government executives who manage state telecommunications networks. This task is substantial by any measure. NASTD executives procure and administer the communications facilities and systems used by the vast array of state entities, including hospitals, universities, law enforcement agencies, prisons and a multitude of other state agencies. A key aspect of this effort is ensuring that the public has convenient telecommunications access to all state institutions and programs.

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The Commission and the parties submitting comments in Docket No. 92-105 specifically recognized the limited availability of N11 codes. The requests for N11 service codes far exceed the number available. Both public and commercial uses have been advocated. Requests for access to state governments, the federal government, and telecommunications relay services by the deaf must be balanced with requests for access to pay-per-call services, audio text services, and other information services provided by local exchange carriers and others.

The Commission has recognized that the demand for N11 service codes will likely exceed the supply in the Notice of Proposed Rulemaking in CC Docket No. 92-105, 7 FCC Rcd 3004, 3005 (1992) ("Notice"). With the new requests for N11 codes, the excessive demand is readily apparent. The Commission can either make a determination as to the most appropriate uses of these limited numbering resources or it can continue to allow the local exchange carriers to allocate those numbers.

NASTD strongly urges the Commission to decide how the public interest would best be served in the allocation of N11 service codes. The Commission is currently engaged in a proceeding to reassign the responsibilities for administering the North American Numbering Plan from Bellcore to an independent entity, CC Docket No. 92-237. The concerns here are similar. Thus, the Commission should remove any partiality or conflict from the assignment of N11 codes and, in this case, should make such decisions itself, rather than leave them to the local exchange carriers, who, in many cases, offer information services themselves.



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Assignment of an N11 code to state government will serve the public interest for several reasons. First, the public as a whole would benefit from the availability of an N11 code to access state government. Virtually everyone at one time or another has the need for information or assistance from their state government agencies. Second, enhanced convenience of accessing state institutions and programs through N11 dialing not only makes it simpler for access, but also makes the services provided by the state agencies more readily available to the public. Thus, the public interest is served. Third, assignment of the same code to all state governments would enhance accessibility and convenience on the part of citizens by creating a standardized, nationwide dial-up access to state public resources. Regardless of the state where a person is, access to state institutions would be the same. This is particularly valuable in our increasingly mobile society. Similarly, assignment of an N11 code for public access to the federal government would serve the public interest.

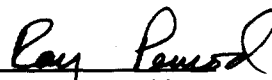
Contrast these public benefits to where N11 codes would be assigned to commercial uses of information services. While that may offer benefits to a few, it does not have the broad public appeal that state government use has. Purely commercial use would exhaust N11 code availability rapidly. It would favor a few by conveying them an unreasonable and unduly competitive advantage in the information services marketplace. The decision of who should receive such gain when the demand is greater than the supply of N11 codes becomes critical. The proper decision becomes apparent when an alternative exists that can benefit the public at large.

In summary, N11 service codes are part of a world-wide telecommunications numbering plan that is, in every sense, a public resource. NASTD strongly believes that, in view of the scarcity of this resource, every effort should be made to ensure that it is utilized in a way that advances the widest possible public interest. Requiring assignment of one of the few N11 service codes to state governments and another to the federal government satisfies this test.

The NASTD urges the Commission to designate 211 as the National State Information Access Number, assign that service code to each NASTD state government representative to coordinate for each state, and direct all local exchange carriers to offer 211 access to state governments at cost. The NASTD also advocates that the Commission designate another N11 service code to the GSA for access to the federal executive agencies, consistent with the GSA petition.

Respectfully submitted,

NATIONAL ASSOCIATION OF STATE
TELECOMMUNICATIONS DIRECTORS

By: 
Ray Penrod, President

attachments: NASTD N11 Resolution
NASTD September 22, 1993 N11 Letter

cc: NASTD Executive Board
NASTD Regulatory Committee



National Association of State Telecommunications Directors

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September 22, 1993

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AUG 15 1994

FCC MAIL ROOM

The Honorable James H. Quello
Acting Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

EX PARTE PRESENTATION In CC Docket No. 92-105

Dear Chairman Quello:

On behalf of the National Association of State Telecommunications Directors ("NASTD"), I respectfully request that the Commission adopt policies and rules requiring assignment of an N11 service code to state governments. Granting this request will further the public interest by ensuring citizens uniform and easy telecommunications access to state agencies and institutions.

NASTD is the national association of government executives who manage state telecommunications networks. This task is substantial by any measure. NASTD executives procure and administer the communications facilities and systems used by the vast array of state entities, including hospitals, universities, law enforcement agencies, prisons and a multitude of other state agencies. A key aspect of this effort is ensuring that the public has convenient telecommunications access to all state institutions and programs.

Requiring assignment of an N11 service code to state governments will greatly enhance such convenience. Such codes are an abbreviated (3-digit) dialing convention that states can use to offer the public a simple "gateway" mechanism for contacting individual state institutions. Assigning the same code to each state government (e.g., "211") would further enhance citizens' convenience by creating standardized, nationwide, dial-up access to public resources. No matter what state a person happens to be in, access to public institutions would be available by dialing 211.



SECRETARIAT: The Council of State Governments

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Honorable James H. Quello
September 22, 1993
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Last year the Commission initiated a proceeding to adopt rules governing the assignment of N11 codes (CC Docket No. 92-105). The Commission also sought comment on a tentative proposal to make such codes available to private entities for their individual use in providing local pay-per-call services. The record in Docket 92-105 demonstrates unequivocally that this proposal should not be adopted. The vast majority of commenters agree that N11 codes are an extremely scarce resource; that permitting commercial use of such codes will thereby secure an unreasonable and undue competitive advantage in the information services marketplace; and that an ample supply of alternative dialing arrangements is available for commercial purposes. Under these circumstances, adoption of the Commission's tentative proposal is an unnecessary act that will further no public policy goals.

N11 service codes are part of a world-wide telecommunications numbering plan that is, in every sense, a public resource. The NASTD strongly believes that in view of the scarcity of this resource, every effort should be made to ensure that it is utilized in a way that advances the widest possible public interest. Requiring assignment of one of the few remaining N11 service codes to state governments satisfies this test.

The principles expressed in this letter reflect those embodied in a recently adopted NASTD resolution concerning N11 service code utilization. A copy of that resolution is enclosed for your review. On behalf of all NASTD members, I respectfully request that the Commission give these principles every favorable consideration.

Sincerely,



Ray Penrod
President, NASTD

Enclosure: NASTD N11 Resolution

cc: Commissioner Andrew C. Barrett
Commissioner Ervin S. Duggan
William F. Caton, Acting Secretary
Peyton L. Wynns, Chief, Industry Analysis Division
Allen Barna, Esquire

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National Association of State Telecommunications Directors

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16th Annual Conference and Trade Show
September 5 - 9, 1993
San Antonio, Texas

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RESOLUTION

Whereas, the FCC is considering its official position on the use of N11 to provide citizens easy access to information,

Whereas, citizens rely on state governments to access information regarding services within each state,

Whereas, N11 offers an easy, memorable method for citizens throughout each state to access public information from state government,

Whereas, electronic access to government information is mandated to all state governments today and in the future,

Whereas, technological change in computing and telecommunications will offer significantly improved access to government services through the public switched network,

Whereas, the access number 911 has been designated as the common access number for emergency services, and this has proven highly beneficial to society in that 911 is now recognized by citizens as a universal, nationwide emergency access number, the designation of a second universal access number for access to state information would provide similar benefits, now therefore,

Be It Resolved that the National Association of State Telecommunications Directors respectfully requests that the FCC:

- (1) Designate 211 as the National State Information Access Number,
- (2) Assign 211 to each state government representative to NASTD to coordinate for each state,
- (3) Direct the local exchange carriers in the country to offer 211 access to state governments at cost.

Approved this 6th day of September 1993
by the members at the
NASTD 16th Annual Conference and Trade Show
San Antonio, Texas

Ray Penrod
President

Anthony Herbert
Secretary/Treasurer